ATTORNEYS AT LAW

KELLEN R. SCOTT SHAREHOLDER DIRECT: 713.356.1767 KELLEN.SCOTT@CHAMBERLAINLAW.COM 1200 SMITH STREET, SUITE 1400 HOUSTON, TEXAS 77002 713.658.1818 800.342.5829 FAX: 713.658.2553 HOUSTON ATLANTA PHILADELPHIA SAN ANTONIO

July 21, 2020

## Via CM/ECF

United States Magistrate Judge Andrew M. Edison United States Courthouse 601 Rosenberg, Seventh Floor Galveston, Texas 77550

Re: No. 3:20-CV-00090; H. Stuart Campbell, Jr. v. Texas Tea Reclamation, LLC

United States District Court, Southern District of Texas, Galveston Division

## Dear Judge Edison:

This letter is in response to your July 15, 2020 Order in the above-referenced matter. [Doc. No. 15].

The Court has subject matter jurisdiction under 28 U.S.C. § 1332 because the parties are completely diverse, and the amount in controversy exceeds the \$75,000 threshold, exclusive of interest and costs. [Doc. No. 1] ¶ 3. The Plaintiff in this case is H. Stuart Campbell, Jr., who asserts his claims in his representative capacity as the executor of his father's estate, the Estate of H. Stuart Campbell, Sr. *Id.* ¶ 1. Campbell, Jr. is deemed to be a citizen only of the same state as his father. 28 U.S.C. § 1332(c)(2). Campbell, Sr. was a citizen of the State of North Carolina when he passed away.

Defendant Texas Tea Reclamation, LLC is a limited liability company organized under the laws of the State of Texas with two individual members: John E. Williams, III and Dymra Henderson Williams. [Doc. No. 1]  $\P$  2. John and Dymra Williams are both Texas citizens. *Id*.

As all parties on one side of this controversy are citizens of different states (North Carolina) from all persons on the other side (Texas), there is complete diversity between the Plaintiff and Defendant, and the Court has subject matter jurisdiction.

Sincerely,

Kellen R. Scott

KRS:

cc: <u>Via CM/ECF</u> Counsel of Record